

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed December 23, 2005. In order to advance prosecution of this case, Applicants amend Claims 1, 19, 21, 22, 30, 48, 50, 51, and 59. Applicants cancel Claims 2, 3, 20, 23, 31, 32, 49, and 52 without prejudice or disclaimer. Applicants respectfully request reconsideration and favorable action in this case.

Information Disclosure Statement

The Examiner notes that there is no copy of the reference cited in Applicants' August 6, 2004 Information Disclosure Statement, entitled "Products, AnyCOM Bluetooth Products", ANYCOM, 1 page and that it will not be considered under 37 C.F.R. § 1.98(a)(2). Applicants attach to this response a copy of the reference and the PTO-1449 form citing the reference. Applicants respectfully request that the attached references now be considered.

Section 103 Rejections

The Examiner rejects Claims 1, 3-30, and 32-59 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application No. US 2003/0083013 to Mowery et al. ("*Mowery*") in view of Specification of the Bluetooth System (Version 1.0B, Volumes 1 and 2, December 1, 1999) (the "*Bluetooth Specification*"). Claim 1 as amended includes elements similar to elements included in original Claim 2. As a result, Applicants address the rejection of amended Claim 1 below with respect to the Examiner's rejection of original Claim 2.

As amended, Claim 19 recites:

A system for automatically establishing a wireless connection between adapters, the system comprising:

a slave adapter coupled to a computer system, the slave adapter being operable to automatically:

receive a scan message from a master adapter that is coupleable to a peripheral device;

in response to receiving the scan message, communicate an identifier of the slave adapter to the master adapter

after communicating the identifier to the slave adapter, receive a password request from the master adapter;

in response to receiving the password request, communicate a password to the master adapter;

after communicating the password to the master adapter, receive a success message from the master adapter indicating that the password matches a password stored by the master adapter;
in response to receiving the success message, establish a connection between the master adapter and the slave adapter; and
after the wireless connection has been established, enable communication between the computer system and the peripheral device via the wireless link using a wireless protocol.

Mowery and the *Bluetooth Specification*, both alone and in combination, fail to disclose every element of amended Claim 1 for at least several reasons. First, the proposed *Mowery-Bluetooth Specification* combination fails to disclose a slave adapter operable to, “after communicating the password to the master adapter, receive a success message from the master adapter indicating that the password matches a password stored by the master adapter.” Second, the proposed *Mowery-Bluetooth Specification* combination fails to disclose a slave adapter operable to, “in response to receiving the success message, establish a connection between the master adapter and the slave adapter.” For at least these reasons, the proposed *Mowery-Bluetooth Specification* combination fails to disclose every element of amended Claim 19.

First, the proposed *Mowery-Bluetooth Specification* combination fails to disclose a slave adapter operable to, “after communicating the password to the master adapter, receive a success message from the master adapter indicating that the password matches a password stored by the master adapter.” In addressing similar elements of original Claim 23, the Examiner merely references the authentication scheme disclosed by the *Bluetooth Specification*. *Office Action*, p. 9. The authentication disclosed by the *Bluetooth Specification*, however, only indicates that “[t]he entity authentication used in Bluetooth uses a challenge-response scheme in which a claimant’s knowledge of a secret key is checked through a 2-move protocol using symmetric secret keys.” *Bluetooth Specification*, p. 169. Moreover, “[i]n the challenge-response scheme the verifier challenges the claimant to authenticate a random input (the challenge)...with an authentication code...and return the result SRES to the verifier...” *Bluetooth Specification*, p. 169. This portion of the *Bluetooth Specification* does not however disclose “after communicating the password to the master adapter, receive a success message from the master adapter indicating that the password matches a password stored by the master adapter.” Combining the *Bluetooth Specification* with *Mowery* fails to remedy this omission as *Mowery* does not disclose any form of

password or authentication, nor does *Mowery* disclose any success message transmitted by a master adapter. Consequently, the proposed *Mowery-Bluetooth Specification* combination fails to disclose a slave adapter operable to, “after communicating the password to the master adapter, receive a success message from the master adapter indicating that the password matches a password stored by the master adapter” as recited by amended Claim 19.

Additionally, the proposed *Mowery-Bluetooth Specification* combination fails to disclose a slave adapter operable to, “in response to receiving the success message, establish a connection between the master adapter and the slave adapter.” As noted above, neither *Mowery* nor the *Bluetooth Specification* discloses a slave adapter operable to “receive a success message.” Additionally, *Mowery* fails to disclose a slave adapter that is operable to “establish a connection between the master adapter and the slave adapter” in response to “receiving [a] success message.” As the Examiner concedes, *Mowery* fails to “disclose the detail of establishing Bluetooth connection between the devices.” *Office Action*, p. 3. Thus, *Mowery* fails to disclose a slave adapter operable to, “in response to receiving the success message, establish a connection between the master adapter and the slave adapter.”

Moreover, combining *Mowery* with the *Bluetooth Specification* does not remedy this omission as the *Bluetooth Specification* also fails to disclose these elements. The portion of the *Bluetooth Specification* cited by the Examiner as disclosing “establish[ing] a connection...” states only that “[a]fter the initialization procedure, the units can proceed to communicate, or the link can be disconnected.” P. 153, ¶ 3. The cited portion of the *Bluetooth Specification* does not however disclose a slave adapter operable to, “in response to receiving the success message, establish a connection between the master adapter and the slave adapter.” Thus, the proposed *Mowery-Bluetooth Specification* combination also fails to disclose a slave adapter operable to, “in response to receiving the success message, establish a connection between the master adapter and the slave adapter.”

As a result, the proposed *Mowery-Bluetooth Specification* combination fails to disclose every element of amended Claim 19. Claim 19 is thus allowable for at least these reasons. Applicants respectfully request reconsideration and allowance of Claim 19 and its dependents.

Although of differing scope from Claim 19, Claim 48 include elements that, for reasons substantially similar to those discussed with respect to Claim 19 are not disclosed,

taught, or suggested by the cited references. Claim 48 is thus allowable for at least these reasons. Applicants respectfully request reconsideration and allowance of Claim 48 and its dependents.

Additionally, for the purposes of advancing prosecution, Applicants cancel Claims 3, 20, 23, 32, 49, and 52. Applicants respectfully note that, with respect to all cancellations and amendments herein, Applicants reserve the right to pursue broader subject matter than that presently claimed by the filing of continuations and/or other related applications.

The Examiner rejects Claims 2 and 31 under 35 U.S.C. § 103(a) as being unpatentable over *Mowery* in view of the *Bluetooth Specification* and U.S. Patent No. 6,785,748 issued to Mikuni et al. (“*Mikuni*”). Applicants amend Claim 1 to include elements similar to elements included in original Claim 2. Consequently, Applicants address the Examiner’s rejection of original Claim 2 here with respect to amended Claim 1. As amended, Claim 1 recites:

A system for automatically establishing a wireless connection between adapters, the system comprising:

a master adapter coupleable to a peripheral device and operable to:

determine that the master adapter has been uncoupled from the peripheral device;

automatically enter an inquiry mode in response to determining that the master adapter has been uncoupled from the peripheral, the master adapter being operable to automatically establish one or more wireless connections between the master adapter and one or more slave adapters in the inquiry mode, the one or more slave adapters being coupled to one or more computer systems;

determine that the master adapter has been coupled to the peripheral device; and

automatically enter an operational mode in response to determining that the master adapter has been coupled to the peripheral device, the master adapter being operable to enable communication between the peripheral device and the one or more computer systems via the one or more wireless connections using a wireless protocol in the operational mode.

Mowery, the *Bluetooth Specification*, and *Mikuni*, both alone and in combination, fail to disclose every element of amended Claim 1 for at least several reasons. First, the proposed *Mowery-Bluetooth Specification-Mikuni* combination fails to disclose a master adapter operable to “automatically enter an inquiry mode in response to determining that the master adapter has been uncoupled from the peripheral.” Second, the proposed *Mowery-Bluetooth Specification-Mikuni* combination fails to disclose a master adapter operable to

“automatically enter an operational mode in response to determining that the master adapter has been coupled to the peripheral device.” For at least these reasons, as discussed in greater detail below, the proposed *Mowery-Bluetooth Specification-Mikuni* combination fails to disclose every element of amended Claim 1.

First, Mowery fails to disclose a master adapter operable to “automatically enter an inquiry mode in response to determining that the master adapter has been uncoupled from the peripheral.” As the Examiner concedes “Mowery does not explicitly disclose the first event comprises one or more of the following: the master adapter being powering up [sic]; the master adapter being uncoupled from the peripheral device; and the master adapter being reset.” *Office Action*, p. 11.

Moreover, combining Mowery with either or both of the *Bluetooth Specification* and *Mikuni* fails to remedy this omission as neither of these references disclose such limitations either. With respect to the *Bluetooth Specification*, the Examiner cites a portion of the reference that states “before any two Bluetooth-equipped devices can communicate with each other the following may be needed: the devices need to be powered-on and initialized...” P. 71, ¶ 1. Nonetheless, the cited portion of the *Bluetooth Specification* does not disclose a master adapter operable to “automatically enter an inquiry mode in response to determining that the master adapter has been uncoupled from the peripheral” as recited by amended Claim 1. Similarly, the cited portion of *Mikuni* states only that:

When the power of the intelligent terminal 202 is turned on, the facsimile manager 301 is started, and the Bluetooth control task 309 sends an Inquiry to the facsimile apparatus 201 via the Bluetooth controller 310 at step S801.

Col. 14, ll. 54-57.

Nonetheless, the cited portion of *Mikuni* also fails to disclose a master adapter operable to “automatically enter an inquiry mode in response to determining that the master adapter has been uncoupled from the peripheral.” Consequently, the proposed *Mowery-Bluetooth Specification-Mikuni* combination fails to disclose a master adapter operable to “automatically enter an inquiry mode in response to determining that the master adapter has been uncoupled from the peripheral” as recited by Claim 1.

Second, the proposed *Mowery-Bluetooth Specification-Mikuni* combination also fails to disclose a master adapter operable to “automatically enter an operational mode in response to determining that the master adapter has been coupled to the peripheral device.” The

Examiner identifies no portion of *Mowery* as disclosing “enter[ing] an operational mode in response to determining that the master adapter has been coupled to the peripheral device,” and Applicants find no reference in *Mowery* to such an element. Thus, *Mowery* fails to disclose a master adapter operable to “automatically enter an operational mode in response to determining that the master adapter has been coupled to the peripheral.”

Moreover, combining *Mowery* with either or both of the *Bluetooth Specification* and *Mikuni* also fails to remedy this omission as neither of those references disclose such limitations either. The portion of the *Bluetooth Specification* cited by the Examiner in addressing similar elements in original Claim 2 states only that “[a]fter the initialization procedure, the units can proceed to communicate, or the link can be disconnected.” P. 153, ¶ 3. Nonetheless, the cited portion does not disclose “enter[ing] an operational mode in response to determining that the master adapter has been coupled to the peripheral device.” Moreover, the Examiner identifies no portion of *Mikuni* as disclosing “enter[ing] an operational mode in response to determining that the master adapter has been coupled to the peripheral device,” and Applicants find no reference in *Mikuni* to such an element. Consequently, the proposed *Mowery-Bluetooth Specification-Mikuni* combination fails to disclose a master adapter operable to “enter an operational mode in response to determining that the master adapter has been coupled to the peripheral device” as recited by amended Claim 1.

Furthermore, Applicants respectfully note that, to establish a prima facie case of obviousness, the Examiner must identify within the references some suggestion or motivation to combine the references. M.P.E.P. § 2143. Applicants respectfully assert that the Examiner provides no such suggestion or motivation. With respect to the proposed combination, the Examiner states only that:

[I]t would have been obvious to one of ordinary skill in the art at the time the invention was made to include automatically entering inquiry mode in response to the master device being powering up as taught by Bluetooth Specification and/or Mikuni in the system of *Mowery* to immediately establish wireless connection after the device is powered and also to eliminate the need for user to initiate the wireless connection.

Office Action, p. 12.

These conclusory statements however identify no motivation or suggestion within the references to combine the references as required by M.P.E.P. § 2143 and amount to hindsight reconstruction of Claim 1. Thus, the proposed combination is improper.

As a result, the proposed *Mowery-Bluetooth Specification-Mikuni* combination fails to disclose, teach, or suggest every element of amended Claim 1. Additionally, the proposed combination is improper. Claim 1 is thus allowable for at least these reasons. Applicants respectfully request reconsideration and allowance of Claim 1 and its dependents.

Although of differing scope from Claim 1, Claims 30 and 59 include elements that, for reasons substantially similar to those discussed with respect to Claim 1, are not disclosed, taught, or suggested by the cited references. Applicants respectfully request reconsideration and allowance of Claims 30 and 59, and their respective dependents.

Additionally, for the purposes of advancing prosecution, Applicants cancel Claims 2 and 31. As noted above, with respect to all cancellations and amendments herein, Applicants reserve the right to pursue broader subject matter than that presently claimed by the filing of continuations and/or other related applications.

Conclusions

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending Claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

The Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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